In re MARK A. ROSS, Application No. 09/910,227
Amendment B

REMARKS

The Office action dated September 8, 2005, and the references cited have been fully considered. In response, please enter the amendments presented herein and consider the following remarks. Reconsideration and/or further prosecution of the application is respectfully requested. No new matter is added herein.

Applicant appreciates the Office's consideration of the submitted references and the return of the 1449 indicating such consideration of all of these references.

Applicants have taken this opportunity to cleanup a definition in the specification to be consistent with common usage. The term "content-addressable memory" is updated to ensure it complies with standard usage in the art, and the specification is amended herein to clarify the description of computer-readable medium in accordance with the MPEP. No new matter is added in this paper.

In terms of the amendments to the claims, claim 30 is canceled herein which was a Beauregard claim depending from independent claim 26. New claims 59-62 are added herein to which correspond to independent claim 26 and its dependent claims 27-29 re-written in Beauregard format. Therefore, support for these new claims is provided by original claims 26-30.

In Amendment A filed on May 2, 2005, Applicant made the following statement:

"Applicant will first dispense with each of the § 103(a) rejections by the following statement: Application 09/910,277, (the present application), and Patent US 6,377,577, (a reference cited in each of the § 103 rejections), were at the time the invention of application 09/910,277 was made, owned by, or subject to an obligation of assignment to, the same person. For at least these reasons, claims 6, 8, 9, 19, 24, 27, 32, 35, 44, 47, 49, 53 and 56 are believed to be allowable as the primary § 103 is removed from being prior art."

Applicant still stands by this statement, and this reference is not prior art under § 103/102(e).
Additionally, after further investigation, it has been discovered that an embodiment of

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Bechtolsheim et al., US Patent 6,377,577, was most likely used in a product, with such a product being first publicly disclosed or placed on sale no earlier than October 2000. As the present application was filed on July 20, 2001, the product is not prior art under § 102(b). Moreover, the invention claimed in the present application was invented before the October 2000, date and therefore, the product in not prior art under § 102(a); nor is the present application unpatentable under 35 USC § 102(c) or (d). Therefore, Applicants believe all claims are allowable over Bechtolsheim et al., US Patent 6,377,577, and any product using an embodiment thereof.

Applicant appreciates the Office allowing claims 1-30 and 39-54. Claims 1-29, 39-54, and 59-62 are believed to be allowable for at least the reasons determined by the Office that these claims 1-30 and 39-54 are allowable.

The remaining pending claims, claims 31-32, 33-38 and 55-58 stand rejected under 35 USC § 102(b) as being anticipated by White et al., US Patent 5,845,324. Applicant respectfully traverses these rejections as this complex reference neither teaches nor suggests all the recited limitation of any pending claim, as required by the MPEP for a proper rejection.

First, Applicant notes that CAMs 54 of White et al. operate differently from a standard binary CAM as White et al.'s CAMs 54 receive an address ("address index") identifying which entries of CAMs 54 (i.e., one from each of the four CAMs) is to perform the comparison operation based on the input comparison value ("address tag"), and then each of these four CAMs issues a "HIT" signal indicating whether or not the stored value matches the address tag. White et al., col. 8. lines 29-32. In contrast, a typical CAM receives a lookup comparison value and compares it to each of its stored entries, and if one of them matches, it generates a hit signal as well as an index identifying which entry matched. White et al. neither teaches producing an index as the index is input to the CAM so it can perform its operation. Moreover, Applicant submits that it teaches away from generating such an index as it receives the "address tag" as input, and each CAM only compares one entry - that at the location identified by the "address tag" and not multiple entries - so there is no reason to identify which

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entry matches as it can only be that at identified by the input "address tag" value. Moreover, Applicants do not believe that Status RAM 56 is coupled to CAMs 54, rather, FIG. 3A illustrates Address Index 56x being received by Status RAM 56 and CAMs 54. Moreover, Status RAM 56 does not receive the index generated by CAMs 56, rather it merely retrieves a value based on Address Index 56x.

Applicant believes that White et al. neither teaches nor suggests all the limitations of original independent claim 31. However, Applicant has amended claim 31 to explicitly recite the continuity of the flow of recited elements, as, for example, shown in FIG. 3B and described on pages 7-8 of the original application. For at least the reasons discussed herein, Applicant believes that the prior art of record neither teaches nor suggests at least the recited limitations of a CAM generating an index, a memory coupled to the CAM, a memory retrieving the data protection field based on the index generated by the CAM, the data protection generator generating the comparison value based on the index received from the CAM, nor the comparison mechanism comparing the comparison value generated by the data protection generator and the data protection field retrieved from the memory. For at least these reasons, claims 31-32 are believed to be allowable.

Applicant believes that White et al. neither teaches nor suggests all the limitations of original independent claim 33; however, Applicant has amended claim 33 to explicitly recite the continuity of the flow of recited elements with support at least provided as described *supra*. For at least the reasons discussed *supra*, independent claim 33 and its dependent claims 34-38 are believed to be allowable.

Finally, Applicant believes that White et al. neither teaches nor suggests all the limitations of original independent claim 55; however, Applicant has amended claim 55 to explicitly recite the continuity of the flow of recited elements with support at least provided as described *supra*. For at least the reasons discussed *supra*, independent claim 55 and its dependent claims 56-58 are believed to be allowable.

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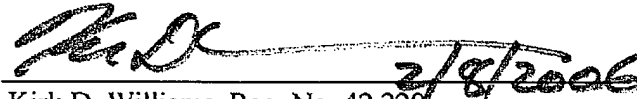In re MARK A. ROSS, Application No. 09/910,227
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FINAL REMARKS. In view of the above remarks and for at least the reasons

presented herein, all pending claims are believed to be allowable over the prior art of record,

the application is considered in good and proper form for allowance, and the Office is

respectfully requested to issue a timely Notice of allowance in this case. If, in the opinion of

the Office, a telephone conference would expedite the prosecution of the subject application,

the Office is invited to call the undersigned attorney.

Applicant believes a two-month extension of time is required, and hereby petitions any

extension of time required and has included herewith a credit card payment form (PTO-2038)

for payment of the extension fee, and Applicant's representative hereby authorizes the

Commissioner to charge/credit any additional associated fees to Deposit Account No. 501430.

Respectfully submitted,
The Law Office of Kirk D. Williams

Date: February 8, 2006

By _____

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